

FRIENDS OF THE EVERGLADES, INC., a Florida not-for-profit corporation, and CENTER FOR BIOLOGICAL DIVERSITY, a 501(c)(3) nonprofit organization,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as Secretary of the UNITED STATES DEPARTMENT OF HOMELAND SECURITY; TODD LYONS, in his official capacity as Acting Director of the UNITED STATES IMMIGRATION AND CUSTOMS ENFORCEMENT; KEVIN GUTHRIE, in his official capacity as Executive Director of the Florida Division of Emergency Management; and MIAMI-DADE COUNTY, a political subdivision of the State of Florida;

Defendants.

**DECLARATION OF BETTY OSCEOLA**

1. My name is Betty Osceola and I make this declaration based on my personal knowledge. If called as a witness, I could and would competently testify to the facts set forth herein.

2. I am a member of the Miccosukee Tribe of Indians of Florida. I grew up in the Everglades not far from the Dade-Collier Training and Transition Airport (the "TNT Site"), and continue to live in the area.

3. The Big Cypress National Preserve is known for the beauty of its dark night skies. When I learned of the proposal to transform the TNT Site into a mass detention center, among my concerns, with the impact of light pollution from the facility. The TNT site historically was dark at night.

7/2/25 4. Attached hereto as Exhibit 1 is a true and accurate photograph I took on using my iPhone 13 camera. I was physically present when the photograph was taken and it fairly and accurately depicts what I saw at the time. I have not altered or edited the image in any way.

5. The photograph was taken at Near MM 30.5, approximately 15 miles from the TNT Site and depicts the light pollution emanating from the Site. The distance between where I was when I took the photograph and the TNT Site is depicted below:





I declare under penalty of perjury that the foregoing is true and correct and was executed  
July 3, 2025, in Miami-Dade County, Florida.

*Betty Osceola*  
Betty Osceola





Exhibit D